

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

AMBER TILLEY and MICHAEL TILLEY, as next §
friend for their minor child, P.T., §

Plaintiff, §

v. §

PEASTER INDEPENDENT SCHOOL DISTRICT; §
JULIE WEST, individually and as an §
employee of Peaster Independent School District; §
DEBBIE VAN RITE, individually and as an §
employee of Peaster Independent School District; §
DOES I-XX, inclusive, §

Defendants. §

Case No.:4:12-cv-00408-Y

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO
DEFENDANTS' MOTION TO DISMISS AND BRIEF IN SUPPORT**

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COME Plaintiffs, Amber Tilley and Michael Tilley, filing this, their Plaintiffs' Unopposed Motion for Extension of Time to Respond to Defendants' Motion to Dismiss and Brief in Support, showing unto this honorable Court as follows:

I.

Defendants filed their Motion to Dismiss and Brief in Support on October 30, 2012. Pursuant to Local Rules 7.1(e), Plaintiffs' response would be due on November 20, 2012.

II.

Since receiving said Motion, the undersigned counsel has, apart from everyday work (involving numerous cases in several jurisdictions), devoted much time and attention to various matters, including but not limited to the following:

- On November 7, 2012, the undersigned counsel traveled to San Francisco to appear and give oral argument before the Ninth Circuit Court of Appeals which was set for November 9, 2012, in regards to an appeal styled Appeal Court No. 11-15979; *Boar, Inc., et. al. v. County of Nye, et. al.*, D.C. No. 2:08-cv-1091.
- The undersigned counsel has also been preparing for trial set for November 26, 2012, before the District Court of Clark County, Nevada in regards to a case styled A-09-589431-C; *Oliva, et. al. v. Phoenix Gardens of Nevada, LLC*.

III.

Plaintiffs' request a fourteen (14) day extension up to and including December 4, 2012 to file their Opposition to Defendants' Motion to Dismiss and Brief in Support.

IV.

The undersigned counsel has contacted opposing counsel for Defendants, and they are unopposed to Plaintiffs' request for a fourteen (14) day extension.

WHEREFORE, Plaintiffs request that the Court grant this Motion for Extension of Time to Respond to Defendants' Motion to Dismiss and Brief in Support until December 4, 2012.

Respectfully submitted:

/s/ Jason J. Bach
JASON J. BACH
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Attorney in Charge for Plaintiff

CERTIFICATE OF CONFERENCE

This is to certify that on November 19, 2012 a conference was held with counsel for Defendant regarding the relief requested in this motion. Cynthia Hill, counsel for Defendants, does not oppose the relief requested.

s/ Jason J. Bach

JASON J. BACH

NOTICE OF ELECTRONIC FILING

The undersigned counsel hereby certifies that he has electronically submitted for filing a true and correct copy of the above and foregoing in accordance with the Electronic Case Files System of the Northern District of Texas on the 20th day of November, 2012.

s/ Jason J. Bach

JASON J. BACH

CERTIFICATE OF SERVICE

I hereby certify that on the 20th day of November, 2012, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to the following attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means:

CYNTHIA L. HILL
306 W. 7th Street, Suite 1045
Fort Worth, Texas 76102

s/ Jason J. Bach

JASON J. BACH